

Refrigerated Prepared Foods

2001 Butterfield Road Downers Grove, IL 60515-1049 (630) 512-1190 (630) 512-1121 Fax

Paul S. Halberstadt Director, **Environmental Engineering**

September 29, 2000

The Performance Track Information Center Industrial Economics, Inc. 2067 Massachusetts Avenue Cambridge, MA 02140

Subject: ConAgra Application

EPA Performance Track

Dear Julie Spyres:

Enclosed are 13 applications for multiple facilities within ConAgra for the EPA Performance Track. The facilities are the following:

- ConAgra Beef Company, Grand Island, NE A07 0004
- ConAgra Beef Company, Kersey, CO AOS OSS
- Swift & Company, Worthington, MN AO5 OO18 /
- ConAgra Frozen Foods, Council Bluffs, IA A 07-005
- Gilardi Foods, Trov. OH AOS OO19 V
- Gilardi Foods, Sidney, OH AOS OOZOV
- Gilroy Foods, Gilroy, CA AOA -
 - Gilroy Foods, Fernly, NV AO9 0014
 - Gilroy Foods, King City, CA AOG DOIS
 - Gilroy Foods, Umatilla, OR A10-0005 (alleady processed no complete / yct)
- ✓ Armour Swift-Eckrich, Quincy, MI AOS * COO
- Butterball Turkey (Swift-Eckrich), Wallace, NC AOH OOH4 >
- Swift, Eckrich, Wells, MN AOS 6027 V

On behalf of the Sustainable Development Council of ConAgra we look forward to participating in this process to demonstrate that environmental and business needs can be successfully combined. If you have any questions, please call me at 630-512-1190.

Sincerely yours,

Paul S. Halberstadt

Director, Environmental Engineering

Attachments (13)

Cc: without attachments

Roger Holtorf – EPA

Phil James

Don Radentz Alan Meyer

Robb Casseday Terry Young

Tom Stachura Robert Harris



National Environmental Achievement Track

Application Form

ConAgra Frozen Foods-Council Bluffs
Name of facility
ConAgra, Inc
Name of parent company (if any)
1023 South Fourth Street
Street address
Street address (continued)
Council Bluffs, IA 51503-6555
City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name Barry Hiller

Title Regulatory Compliance Manager

Phone 712-322-0203

Fax 712-325-5289

E-mail Barry.Hiller@ConAgra.Com

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility. Identify your environmental requirements.



1	What do you do or make at your facility?	We prepare and package Healthy Choice and Maire Callender frozen entrees and dinners. We also prepare and package food service bulk pan foods for commerical and institutional use.
2	List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.	SIC 2038 NAICS
3	Does your company meet the Small Business Administration definition of a small business for your sector?	☐ Yes
4	How many employees (full-time equivalents) currently work at your facility?	 ☐ Fewer than 50 ☐ 50-99 ☐ 100-499 ☑ 500-1,000 ☐ More than 1,000

5	Does your facility have an EPA ID number(s)? If yes, list in the right-hand column.	Yes ☐ No EPCRA (RCRA No) IAD007257207
6	Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right <i>or</i> enclose a completed Checklist with your application.	We have completed and enclosed the checklist with our application.
7	Check the appropriate box in the right-hand column.	☐ I've listed the requirements above. ☑ I've enclosed the Checklist with my application.
8	Optional: Is there anything else you would like to tell us about your facility?	ConAgra Frozen Foods continues to agressively update systems and processes that could affect the environment. Since ConAgra, Inc., purchased this facility and grounds from Blue Star Foods in 1988, many steps have been taken to remove the risk for an environmental accident or release. Our progress includes the removal of all Underground Storage Tanks and above ground transportation fuel storage tanks, the decommission of the West Engine Room, and construction of the new South Engine Room in 1996, just to name a few.

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

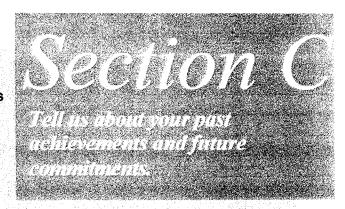


1	Check yes if your EMS meets the requirements for each element below as defined in the instructions.			
	a. Environmental policy	⊠ Yes		
	b. Planning	⊠ Yes		
	c. Implementation and operation	⊠ Yes		
	d. Checking and corrective action	⊠ Yes		
	e. Management review	⊠ Yes		
2	Have you completed at least one EMS cycle (plan-do-check-act)?	⊠ Yes		
3	Did this cycle include both an EMS and a compliance audit?	⊠ Yes		
4	Have you completed an objective self-assessment or third-party assessment of your EMS?	⊠ Yes		
	If yes, what method of EMS assessment did you use?	☐ Self-asse	essment	
			SEMI	☐ Other
			CEMP	
		☐ Third-par	ty assessm	ent
			SO 14001 (Certification
		⊠c	Other ConA	gra Frozen Foods Engineering

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the curre	nt level?
Discharges to Water- Discharge of Chemicals to Waste Water	Quantity	Units	Quantity	Units
	43,843	Pounds per	34,618	Pounds per
	(1997)	Year	(1999)	Year

i. How is the current level an improvement over the previous level?

We reduced our usage of Phosphoric Acid by 9,225 pounds.

ii. How did you achieve this improvement?

Continueous research with our chemical supplier provided better opportunities to sanitize production equipment and at the same time reduce the amount of Phosphoric Acid based product that we discharge in waste water. (As of June 1999, Phosphoric Acid has been removed from the EH Listing.



Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
Material Use - Total Material Use	Quantity 300,433	Units Pounds per Month	Quantity 275,162	Units Pounds per Month
i. How is the current level an previous level?	improvement over	r the		
We have reduced our amo pounds each month.	ount of cardboard p	ackaging used each	n month by approxir	nately 25,000
ii. How did you achieve this i	mprovement?			
One example our research tote instead of 40 individua the production area, recycl transported.	al cardboard carton	s, we could reduce	the amount of card	board handled in

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

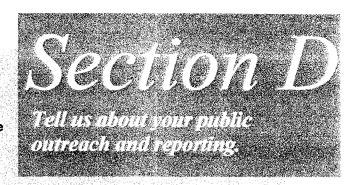
a. What is the aspect?	Material Use - Total Materials	Use
b. Is this aspect identified as significant in your EMS?	⊠ Yes □ No	
 c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. 	Option A: Absolute value	148,000 Pounds (Quantity/Units)
F = = = = = = = = = = = = = = = = = = =	Option B: In terms of	· · · · · · · · · · · · · · · · · · ·
	units of production	(Quantity/Units)

or output

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	☑ Option A: Absolute value☑ Option B: In terms of units of production or output	74,000 pounds (Quantity/Units) (Quantity/Units)	
e. How will you achieve this improvement?	Fully utilizing installed bulk soy oil system. A formula that allows the self manufacturer of marjarine. This will eliminate a large protion of oils that escape via the individual 55 gallon metal barrels by 50 percent. We will also reduce approximately 6,247 pounds of metal sent to the recycler that we will never receive.		
Second aspect you've selected			
a. What is the aspect?	Energy Use - Total Energy Use	•	
b. Is this aspect identified as significant in your EMS?	⊠ Yes □ No		
this as an absolute value or in terms of units of production or output.	Option A: Absolute value	Unknown (Quantity/Units)	
	Option B:In terms ofunits of productionor output	(Quantity/Units)	
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	 ✓ Option A: Absolute value ✓ Option B: In terms of units of production or output 	9,497,970 lbs/Steam (Quantity/Units) (Quantity/Units)	
e. How will you achieve this improvement?	We plan to install a blow down heat recovery unit on our boiler. This heat will be used to heat boiler feed water. We estimate an annual fuel cost saving of approximately \$12,474 or 3,165,990 pounds of steam per year @ \$3.94/1000 lbs of steam.		

Third aspect you've selected			
a. What is the aspect?	Water Use - Total Water U	Jse .	
b. Is this aspect identified as significant in your EMS?	⊠ Yes □ No		
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	Option A: Absolute value Option B: In terms of units of production or output	Unknown (Quantity/Units) (Quantity/Units)	
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	☑ Option A: Absolute value☐ Option B: In terms of units of production or output	9,000 Gallons of Water/Hr (Quantity/Units) (Quantity/Units)	
e. How will you achieve this improvement?	we plan to install water chilling devices on three systems that will re-chill water. this will reduce our water to drain by 3,000 gallons per Hour per chiller.		
Fourth aspect you've selected			
a. What is the aspect?	Energy Use - Total Energ	y Use	
b. Is this aspect identified as significant in your EMS?	⊠ Yes □ No		
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	☑ Option A: Absolute value☐ Option B: In terms of units of production	81.2% efficiency (Quantity/Units) (Quantity/Units)	
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	or output Option A: Absolute value Option B: In terms of units of production or output	99% efficiency (Quantity/Units) (Quantity/Units)	
e. How will you achieve this improvement?	To use direct contact water	our method of heating hot	

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.



What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.
- 1 How do you identify and respond to community concerns?

 We deal directly with anyone that has an inquiry or question.

 We conducted a Public Meeting in January of this year.

 We conducted a Public Meeting in January of this year.

 We conducted a Public Meeting in January of this year.

 We besite www.

 Newspaper

 Open Houses

 Other



To: Chilton McLaughlin/ARTD/R7/USEPA/US@EPA

CC:

Subject: NEAT Application - Aspects #2 & #3

NEAT Application Notes:

ASPECT #2 - Boiler Blow Down Recovery Project

Under normal operating conditions we blow down the boiler continuously to reduce the suspended solids in the boiler water. This blow down water is used to preheat water going to the boiler. We now recover some of the heat or energy that normally went down the drain. We have installed a heat exchanger that uses the 350 degree blow down water to heat city water coming into the system from an average of 55 degrees to 180 degrees before it enters the boiler. Thus saving the energy to heat this water via the boiler.

Boiler #1 is a 700 HP dry back, two-pass fire-to-boiler, which operates 24 hours per day, 7 days a week.

One HP will evaporate 34.5 pounds of water per hour.

700 HP x 34.5 = 24,150 pounds of water per hour @ 55 degrees F.

85% of 24,150 pounds is fresh water make-up or 20527.5 pounds of water per hour @ 55 degrees F.

1 cu/ft of natural gas = 800 BTUs

A boiler operates at approximately 82% efficiency.

82% of 800 BTUs = 656 BTUs per cu/ft of natural gas.

It takes a 126-degree rise to heat water from 55 degrees to 180 degrees F.

It takes 1 BTU to raise 1 pound of water 1 degree F.

20,527.5 pounds of water per hour x 125 degrees F = 2,565,937.6 BTUs an hour.

2,565.937.5 BTUs / 656 BTUs = an average minimal savings of 3,911.49 cu/ft of natural gas per hour.

(93,875.76 cu/ft of natural gas per day) 93,875.76 x 280 production days = 26,265,212 cu/ft of natural gas per year) (An estimate minimal savings of 78,855.636 cu/ft of natural gas per this three year tracking project) This is a conservative estimate.

ASPECT #3 - Water Recycle Projects on Water Chillers #1, #3 and #5.

This aspect is to recirculate water for continuous use. In the past approximately 3,000 gallons of water per hour passed through this system and

then was dumped into the industrial drain. We created a closed system to maintain this water. (We have also relocated several production line to our plant from closed plants on the East Coast. This has or will increase our water usage. Our plan is to saving fresh treated water.)

Water Chillier #1 is located in the SW corner of the Lyco Pasta Room.

Water is transferred from the water chiller to the pasta cooling reel.

This water is captured and enters a filtering system to remove solids and starches. Approximately 14 gallons of water per minute (840 gallons per hour) are void of the system to remove the solids and starches.

Water is recycled at approximately 2,160 gallons per hour during a production shift.

Water savings of approximately 17,280 gallons of fresh treated water per production shift.

Howary stiffes (4)

Water Chiller #3 is located on the west wall of the "Old Process Area".

This closed system recycles the water used in the cooling jackets of equipment associated with Combo Kitchen #1.

Recycles all water in this system except for that which evaporates.

Water is recycled at approximately 3,000 gallons of water per hour during a production shift.

Savings of approximately 24,000 gallons of water per production shift.

Water Chiller #5 is located in an exterior room east of the Frozen Foods | Production Area.

Recycles the water used in the gravy press and tube-in-tube equipment associated with the Frozen Foods Kitchen I and the water barrels of the Scrape Surface Heat Exchangers (SSHE) in Frozen Foods II.

Recycles all water in this system except for that which evaporates.

Water is recycled at approximately 3,000 gallons of water per hour during a production shift.

Savings of approximately 24,000 gallons of water per production shift.

How many sleeper 45

Flow many studiely

I also faxed you a copy of our Page #10 revision. Thanks, Barry

2 shifts operating day x 220 operating days =

4	Are there any ongoing citizen suits against your facility?	Yes	⊠ No
	If yes, describe briefly in the right-hand column.		

5 List references below

Organization	Name	Phone number
Chamber of Commerce	Matt Buchanan	712-325-1000
Iowa Dividaion of Inspections and Appeals	Willem Burning	515-669-5164 Cellphone
Emergency Management Agency LEPC	Terry Hummel Director	712-328-5777
	Chamber of Commerce Iowa Dividalon of Inspections and Appeals Emergency Management Agency	Chamber of Commerce Matt Buchanan Iowa Dividalon of William Burning Inspections and Appeals Emergency Management Terry Hummel Agency Director

Page Ravision #1 14 November 2000

Mr Burning's telephone number corrected.

Barry E. Hiller
Regulatory Compliance Mgr.

On behalf of ConAgra Frozen Foods - Council Bluffs [my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track
 EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal,
 and local environmental requirements, in place at the facility, and the EMS will be maintained for the
 duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

9-25-00

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title Jon Hickerson

Facility Name ConAgra Frozen Foods - Council Bluffs

Facility Street Address 1023 South 4th Street

Facility ID Numbers Dun & Bradstreet: 556202117

EPA ID# IADoo7257207

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center c/o Industrial Economics Incorporated 2067 Massachusetts Avenue Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

ConAgra Frozen Foods - Council Bluffs

EPCRA (RCRA No.) IAD007257207

1023 south 4th Street, Council Bluffs, Iowa 51503-6555

y ne	cessury)	
		Check All
	Pollution Regulations	That Apply
1.	(10 01201)	
2.	Permits and Registration of Air Pollution Sources	×
3.	General Emission Standards, Prohibitions and Restrictions	\boxtimes
4.	Control of Incinerators	
5.	Process Industry Emission Standards	
6.	Control of Fuel Burning Equipment	
7.	Control of VOCs	
8.	Sampling, Testing and Reporting	
9.	Visible Emissions Standards	. 🗖
10.	Control of Fugitive Dust	Ħ
	Toxic Air Pollutants Control	百
12.	Vehicle Emissions Inspections and Testing	
	Other Federal, State, Tribal or Local Air Pollution Regulations Not Liste	d Above
	(identify)	
13.		
14.		
Haz	ardous Waste Management Regulations	
	Identification and Listing of Hazardous Waste (40 CFR 261)	
	- Characteristic Waste	M
	- Listed Waste	
2.	Standards Applicable to Generators of Hazardous Waste (40 CFR 262)	
۷.	- Manifesting	\boxtimes

Facility Name

Facility Location:

Facility ID Number(s):

(attach additional sheets

	- Pre-transport requirements	\square
	- Record keeping/reporting	$\overline{\boxtimes}$
3.	Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)	
	- Transfer facility requirements	
	- Manifest system and record-keeping	Ħ
	- Hazardous waste discharges	H
4.	Standards for Owners and Operators of TSD Facilities (40 CFR 264)	L
••	- General facility standards	
	- Preparedness and prevention	H
	- Contingency plan and emergency procedures	H
	- Manifest system, Record keeping and reporting	
	- Groundwater protection	님
	- Financial requirements	
	- Use and management of containers	<u> </u>
	- Tanks	님
	- Waste piles	H
	- Land treatment	
- 5	- Incinerators	片
	Interim Status Standards for TSD Owners and Operators (40 CFR 265)	
6.	Interim Standards for Owners and Operators of New Hazardous Waste Land	Ш
7	Disposal Facilities (40 CFR 267)	 -
7.	Administered Permit Program (Part B) (40 CFR 270)	
	Other Federal State Tribal or Local Hazardous Waste Management Dogul	lations Not
	Other Federal, State, Tribal or Local Hazardous Waste Management Regul	ations Not
8	Other Federal, State, Tribal or Local Hazardous Waste Management Regul Listed Above (identify)	ations Not
8. 9		ations Not
8. 9.		ations Not
9.	Listed Above (identify)	ations Not
9. <u>Haza</u>	Listed Above (identify) ardous Materials Management	ations Not
9. <u>Haza</u>	Listed Above (identify) ardous Materials Management Control of Pollution by Oil and Hazardous Substances (33 CFR 153)	ations Not
9. <u>Haza</u> 1.	Listed Above (identify) ardous Materials Management Control of Pollution by Oil and Hazardous Substances (33 CFR 153) Designation of Reportable Quantities and Notification of Hazardous	ations Not
9. Haza 1. 2.	Ardous Materials Management Control of Pollution by Oil and Hazardous Substances (33 CFR 153) Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)	ations Not
9. Haza 1. 2.	Ardous Materials Management Control of Pollution by Oil and Hazardous Substances (33 CFR 153) Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) Hazardous Materials Transportation Regulations (49 CFR 172-173)	ations Not
9. Haza 1. 2. 3. 4.	Ardous Materials Management Control of Pollution by Oil and Hazardous Substances (33 CFR 153) Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) Hazardous Materials Transportation Regulations (49 CFR 172-173) Worker Right-to-Know Regulations (29 CFR 1910.1200)	ations Not
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4. 5.	Solid Waste Storage and Removal Requirements Disposal Requirements for Special Wastes					
	Other Federal, State, Tribal or Local Solid Waste Management Regulati Listed Above (identify)	ons Not				
6.	Listed Above (identity)					
7.						
Wat	Water Pollution Control Requirements					
1.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)	\boxtimes				
2.	Designation of Hazardous Substances (40 CFR 116)	$\overline{\boxtimes}$				
3.	Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)	\boxtimes				
4.	NPDES Permit Requirements (40 CFR 122)	\bowtie				
5.	Toxic Pollutant Effluent Standards (40 CFR 129)					
6.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403)					
7.	Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)					
8.	Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)					
9.	Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)					
10.	Water Quality Standards					
11.	Effluent Limitations for Direct Dischargers	Ħ				
12.	Permit Monitoring/Reporting Requirements	Ħ				
13.	Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants					
14.	Collection, Handling, Processing of Sewage Sludge					
15.	Oil Discharge Containment, Control and Cleanup	Ħ				
16.	Standards Applicable to Indirect Discharges (Pretreatment)					
	Other Federal, State, Tribal or Local Water Pollution Control Regulatio Above (identify)	ns Not Listed				
17.	(woming)	Г				
18.						
Drin	king Water Regulations					
	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146)					
2.	National Primary Drinking Water Standards (40 CFR 141)					
3.	Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)					
4.	Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources					
5.	Underground Injection Control Requirements					

6.	Monitoring, Reporting and Record keeping Requirements for Community Water Systems	
	Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)	
7.		
8.		
Tox	ic Substances	
1.	Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)	
2.	Import and Export of Chemicals (40 CFR 707)	
3.	Chemical Substances Inventory Reporting Requirements (40 CFR 710)	
4.	Chemical Information Rules (40 CFR 712)	
5.	Health and Safety Data Reporting (40 CFR 716)	
6.	Pre-Manufacture Notifications (40 CFR 720)	
7.	PCB Distribution Use, Storage and Disposal (40 CFR 761)	
8. 9.	Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)	
	Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed (identify)	Above
10.	(Monthly)	
11.		
Pest	icide Regulations	
1.	FIFRA Pesticide Use Classification (40 CFR 162)	
2.	Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)	
3.	Certification of Pesticide Applications (40 CFR 171)	
4.	Pesticide Licensing Requirements	
5.	Labeling of Pesticides	
6.	Pesticide Sales, Permits, Records, Application and Disposal Requirements	
7.	Disposal of Pesticide Containers	
8.	Restricted Use and Prohibited Pesticides	
	Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above	
0	(identify)	
9.	•	Ц
10.		
<u>Env</u> 1.	ironmental Clean-Up, Restoration, Corrective Action Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)	
	(oupertune) (monthly)	
		H

2.	RCRA Corrective Action (identify)	
	Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)	
3.		
4.		靣